

**The Stop & Shop Supermarket Company**

An Ahold USA Company

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The Honorable Ann Veneman
Secretary, U.S. Department of Agriculture
Country of Origin Labeling Program
Agricultural Marketing Service
Stop 0249 Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

TRANSMITTED BY FACSIMILE

Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program

Dear Secretary Veneman:

On behalf of The Stop & Shop Supermarket Company, I am writing in response to your request for comments regarding "Guidelines for the Interim Voluntary Country of Origin Labeling". I am the Manager of Seafood Sales and Procurement for Stop & Shop Supermarkets headquartered in Boston, Massachusetts. We operate 335 stores in Connecticut, Massachusetts, New Jersey, New York and Rhode Island employing over 60,000 associates. Our parent company, Royal Ahold, owns six supermarket chains on the East coast. As such, I am very concerned about the country of origin labeling guidelines that you issued.

Our seafood department offers in excess of 300 different selections of fresh and previously frozen seafood products to consumers on a daily basis. The task of identifying to our consumers the country or territorial waters in which each fish or shellfish was caught or raised and processed is enormous. We must be able to depend on our suppliers for that information and you must hold them accountable through strict enforcement mechanisms. We cannot look at a shrimp and determine whether it was caught in U.S. territorial waters or in the waters off of Thailand; nor can we tell whether the fish was farm-raised or wild-caught and, if the latter, the flag that flew on the vessel that caught the fish. The operational challenges of labeling each of those items for retail sale on a daily basis are substantial and unrealistic.

As you develop the regulations, please consider the following:

- Hold suppliers and those who raise or catch seafood accountable for providing complete accurate and verifiable information on the countries in which each stage of production occurs;
- Provide for flexible means of informing consumers of the country of origin of seafood products at retail; and
- Implement reasonable recordkeeping requirements.

Finally, we urge you to conduct the rulemaking promptly and efficiently, since the statute states that retailers have to be in full compliance on September 30, 2004. Please issue regulations that will allow us to comply with the law without limiting our ability to provide consumers with a fresh and abundant seafood supply.

We appreciate your attention to our concerns and thank you for your time regarding this critical issue.

Sincerely,

Chris Kukay
Manager of Seafood Sales and Procurement